

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

DOUGLAS I. HORNSBY, Administrator of)
The Estate of CYNTHIA GARY,)
)
Plaintiff,) Case 2:22-cv-00427
)
v.) In Admiralty
)
THE UNITED STATES OF AMERICA, *et al.*,)
)
Defendants.)
)

**LOCAL CIVIL RULE 5 NOTICE OF
UNITED STATES' MOTION FOR LEAVE TO FILE
UNDER SEAL CERTAIN EXHIBITS TO ITS MOTION FOR SUMMARY JUDGMENT**

Pursuant to Local Civil Rule 5 and the Protective Order entered in this matter (ECF No. 32), the United States of America provides notice of its Motion for Leave to File Under Seal (the “Motion”), which requests that the Court seal exhibits 3, 4, 12, 15, 22, and 23 attached to the United States’ motion for summary judgment in order to protect the United States’ interest in preventing the unauthorized and inadvertent disclosure of sensitive and confidential information that is the subject of the Protective Order. In support of the United States’ Motion, the United States has contemporaneously filed a memorandum in support, which sets forth the grounds for and authorities in support of the Motion.

Parties and non-parties may submit memoranda in support of or in opposition to the United States’ Motion within seven (7) days of the date of filing of the Motion, and may designate all or part of such memoranda as confidential. Any information designated as confidential in a supporting or opposing memorandum will be treated as sealed pending a determination by the Court on the Motion.

Any person objecting to the Motion must file an objection with the Clerk of Court within seven (7) days after the filing of the Motion and if no objection is filed in a timely manner, then the Court may treat the Motion as uncontested.

After the seven (7) day time period for filing a response or any objection to the Motion and any further briefing ordered by the Court, the Court will determine whether the material should remain under seal. The Court may require the filer or the person designating material as confidential to present further argument why certain material should remain under seal. If the Court determines that the appropriate standards for filing material under seal have not been satisfied, it may order that the material be filed in the public record.

[*Signature page follows.*]

Dated: January 30, 2025

Respectfully submitted,

UNITED STATES OF AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2025, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of electronic filing (NEF) to the following counsel of record:

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